

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JUNE BENNETT, JOCELYN MCCALLA and
JUAN VILLALON,

Plaintiffs,

-against-

KINGSBRIDGE HEIGHTS REHABILITATION
CARE CENTER,

Defendant.

Case No.: 07-cv-9456
(LAK)(DFE)

**NOTICE OF MOTION
FOR LEAVE TO
AMEND THE
COMPLAINT**

-----X
PLEASE TAKE NOTICE, upon the annexed affirmation of Pamela J. Eisner, Esq., dated the 22nd day of February, 2008, and the accompanying Memorandum of Law, Plaintiffs June Bennett, Jocelyn McCalla and Juan Villalon (collectively "Plaintiffs") will move before the Honorable Lewis A. Kaplan, United States District Judge at the United States Courthouse, 500 Pearl Street, New York, New York 10007, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, for an Order granting Plaintiffs leave to file and serve an Amended Complaint, a copy of which is attached to the affirmation of Pamela J. Eisner, Esq. as "Exhibit A."

Dated: Farmingdale, New York
February 25, 2008

FRANK & ASSOCIATES, P.C.
Attorneys for Plaintiff

Pamela J. Eisner
Neil M. Frank, Esq. (NF-0521)
Pamela J. Eisner, Esq. (PE-5678)
500 Bi-County Boulevard, 112N
Farmingdale, New York 11735
631-756-0400